

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

TRI-COUNTY ELECTRIC)	
COOPERATIVE, INC.,)	
)	
Complainant,)	
)	
vs.)	Case No. 05-0767
)	
ILLINOIS POWER COMPANY, d/b/a)	
AMEREN IP,)	
)	
Respondent.)	

AFFIDAVIT IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT
BY TRI-COUNTY ELECTRIC COOPERATIVE, INC.

DENNIS R. IVERS, on oath first duly sworn, states as follows:

1. Affiant is an adult and if sworn as a witness in the above cause could competently testify to the following matters.
2. Affiant holds a high school diploma and an associates degrees in electronics engineering technology received in 1975 from the Ohio Institute of Technology, Columbus, Ohio. Affiant commenced employment at Tri-County Electric Cooperative, Inc. (Tri-County) as an assistant staking engineer in April 1979 and served as such until April 1984. Thereafter, Affiant served as project engineer for Tri-County from 1984 through April 1995 and his duties included maintaining engineering analysis and models and responsibility for electrical design of special projects as they are defined by project work plans. In April 1995, Affiant was promoted to System Planning Engineer for Tri-County and served in that capacity until February 1999 performing design specializing and coordination of electrical schemes for the entire electrical

system of Tri-County. In February 1999, Affiant was appointed Director of Engineering for Tri-County with responsibility for all engineering functions including SCADA, AMR, work plans, budgets and electrical system performance. Affiant continues to serve as Director of Engineering for Tri-County.

3. As a part of Affiant's duties as Director of Engineering, Affiant is familiar with the distribution facilities located in the Salem Unit oil field operated by Citation Oil & Gas and the location of the electric service delivery points for the Citation Oil gas compressor sites in dispute in this docket in relationship to Tri-County's distribution facilities.

4. Affiant has prepared a map showing the location of the Citation Oil gas compressor sites No. 1 through 8 and the location of Tri-County's distribution system as shown by Tri-County's business records. The map so prepared is attached hereto and by reference incorporated herein. Such map is a true and accurate depiction of the location of Tri-County's distribution system in relation to the location of the Citation Oil gas compressor sites at issue in this docket.

5. Based upon the location of Tri-County's distribution facilities to the Citation Oil gas compressor sites at issue herein, it is Affiant's opinion Tri-County can provide electric service to the gas compressor sites by means of its existing electric distribution system.

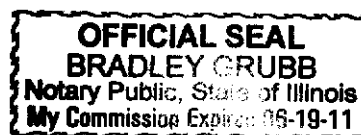
Further Affiant sayeth not.

Dennis R. Ivers
Dennis R. Ivers

Subscribed and Sworn to before me

this 30 day of May, 2008.

Bradley Grubb
Notary Public



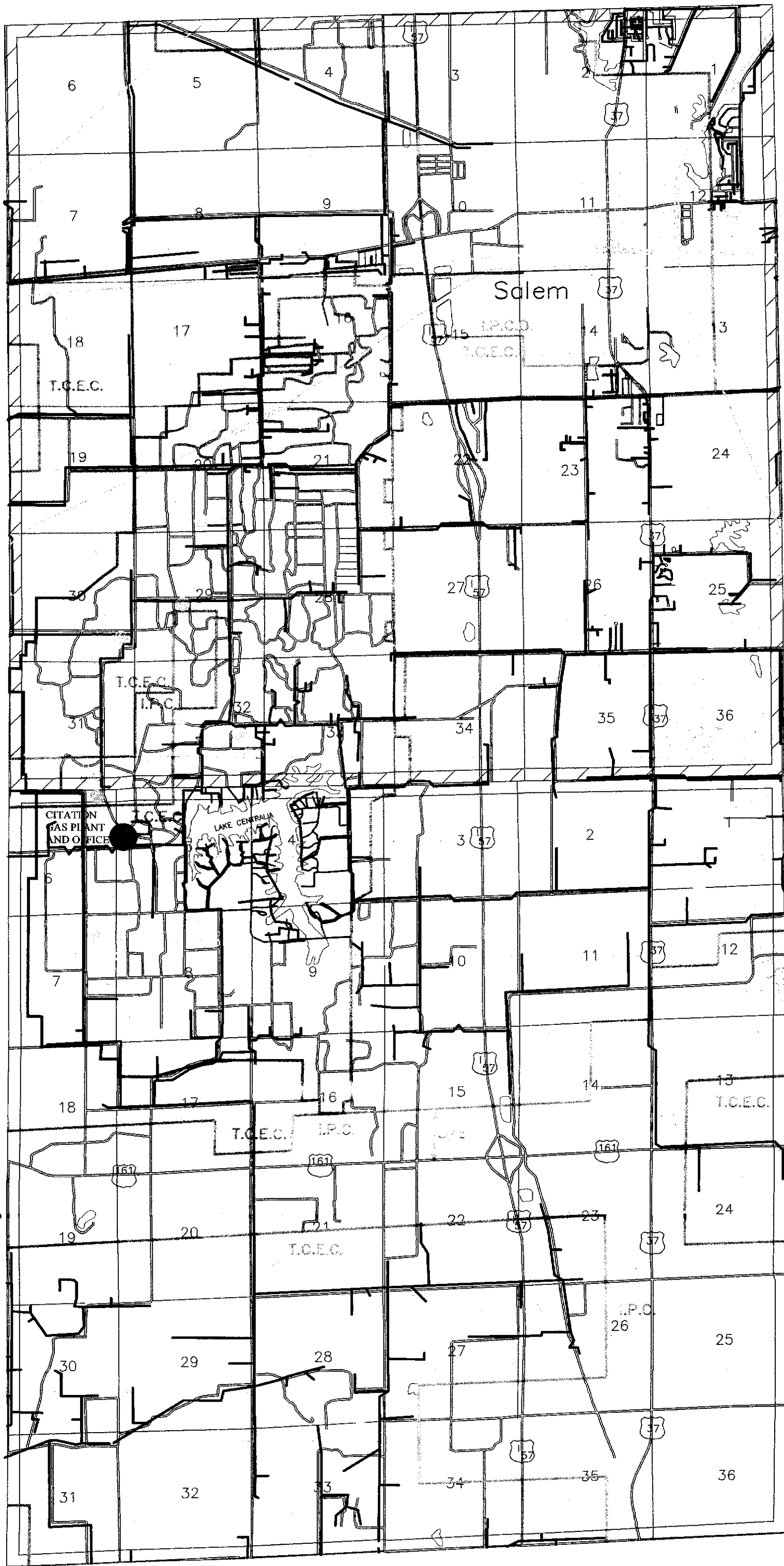
R. 2E.

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APPROXIMATE
CITATION OIL
SALEM UNIT
BOUNDARIES

IP-TCEC
NORMAL
BOUNDARY LINES

— TRI-COUNTY LINES